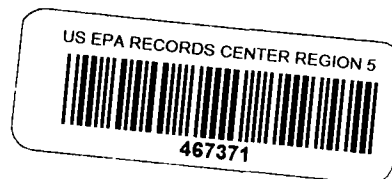


**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
EMERGENCY RESPONSE SECTION 1**

MEMORANDUM

DATE: December 17, 1996
TO: J. E. Berger Site File
FROM: Dave Anderson, OSC
SUBJECT: Work Zone Incident



On December 17, 1996, I entered the work zone from 1130 to 1245 hours in Level C personal protective equipment (PPE). My purpose for being in the work zone was to observe the Riedel/Smith crew and to collect samples of decon water and soils that had been exposed by concrete removal. One of the tasks being conducted during that work period was pressure washing floors (in order to remove PCB contaminated mud/grime solids) and recovery of the resulting fluids (rainwater and washwater) and solids. Weather over the previous 24 hour period had resulted in a significant amount of rainwater accumulation that had to be recovered with pressure washing fluids that were being generated.

Two crew members were involved in the incident that I witnessed, Paul Gordon and Tommy Butler. Gordon was operating the Bobcat and Butler was pressure washing. It appeared as though Butler was directing the activity. A 2 x 4 back stop had been erected between a floor drain and an accumulation of solids. The Bobcat bucket was being used to plow or herd fluids towards the drain. The back stop was being used to direct potentially PCB contaminated fluids into the drain. Due to the noise levels in the building and the Level C PPE communication was difficult. Upon observing this activity, I motioned for the Bobcat operator to stop and questioned the man on the pressure washer as to where the fluids were going. He responded by motioning downward and shrugged his shoulders. I asked if any effort was being made to recover the fluids and he responded similarly. At that time, I advised the pressure washer operator that it was inappropriate to allow potentially PCB contaminated fluids to knowingly escape or discharge from the site without making any effort at recovery or prevention.

I immediately radioed for the Response Manager (RM), Mark Parquette, to meet me at the loading dock. The RM was advised of the activity that I had witnessed and instructed to address the situation. At that point, I continued with sample collection activity.

Later that afternoon, I was advised that the crew had been specifically instructed to recover all fluids in Oshp vacs for transfer to the 1500 gallon poly tank and to drum all solids. I was further advised that disciplinary action was being taken against the two

crew members involved in this incident.

PCB contamination has previously been confirmed in manhole/catch basins within the facility sewers. Current removal action plans include limited cleaning and complete tracing of the drainage system within the building. A complete assessment of the potential discharge caused by this incident will be conducted.

Based on follow-up communications with Riedel/Smith management, I feel that the response to this incident has been adequate.